

**CERTIFICATION OF COUNSEL FOR PLAINTIFF**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Rule 26.1 of this Court's Local Rules of Civil Procedure, and the General Pretrial and Trial Procedures of the Honorable Gene E.K. Pratter of the United States District Court of the Eastern District of Pennsylvania, I certify that counsel representing all Defendants for purposes of the attached Motion to Stay Discovery, Jeremy S. Chase, Esquire and I fully discussed our respective positions regarding requesting a stay of discovery while the Defendants' Motions to Dismiss are pending before the Court and we were not able to reach an amicable resolution.

I hereby verify that the foregoing statements by me are true and correct, and I understand that the statements herein are made subject to the penalties of law relating to unsworn falsification to authorities.

Respectfully submitted,

SPECTOR GADON & ROSEN, P.C.

By: /s/ Alan B. Epstein

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